

REMARKS

Claim 13 is amended. Claims 1-16 and 20 are pending. No new matter has been added.

Claim Rejections under 35 U.S.C. Section 112

Claim 13 is amended to provide proper antecedent bases for the phrase "a packet network". Claims 1 and 4 recite in part a method of performing a continuity check operation that comprises sending a pattern of bits over a packet network connection through a first interface on a packet network to a second interface on the packet network. Applicant respectfully requests that rejections to claims 1-9 and 13-15 under 35 U.S.C. 112, second paragraph, be withdrawn.

Prior Art Rejections under 35 U.S.C. § 103

Claims 1-12 and 20 stand rejected under 35 U.S.C. § 103 as being unpatentable over ITU-T Recommendation I.610, B-IDSN operation and Maintenance Principles and Functions ("I.610"), in view of U.S. Patent No. 6,007,645 (Brueckheimer et. al.). The Brueckheimer et. al. patent does not disclose or suggest the claim limitations missing from the I.610 reference. In particular, there is no suggestion that the adaptive grooming routers (AGR) disclosed in the Brueckheimer patent utilize a narrowband-to-packet network adapter having a bit pattern generator.

Independent claim 1 of the application recites a continuity check operation that includes sending a pattern of bits over a packet network connection wherein the pattern of bits is generated by a narrowband-to-packet network adapter having a bit pattern generator. Independent claims 10, 16, and 20 recite similar features. The continuity check operation employs a pattern of bits that can be used to test for and isolate a wide range of potential failures that may occur in a packet-domain connection or adapters terminating a path. (Specification, page 5, lines 4-8) In one example disclosed in the specification, the bit pattern generator is

programmed to generate a sequence of two complementary 8-bit values in the packet that can be checked. (Specification, page 11, lines 12-16)

The Office action states that the I.610 reference does not disclose a narrowband-to packet adapter having a bit pattern generator but alleges that the Brueckheimer et. al. reference teaches an analogous integrity check in narrow band exchanges and that one would have been motivated to combine these references. Applicant respectfully traverses this rejection. The Brueckheimer et. al. patent does disclose an adaptive virtual junctor (AVJ) that adapts narrow-band traffic to and from an adaptation layer and means to time switch narrow-band channels (Brueckheimer, Col. 3, lines 23-25). However, the disclosed AVJ is different from what is claimed in the current invention. In particular, the Brueckheimer et. al. patent discloses that AVJs may have the capability to send a digital signature thereby guarding against any false simulation of that identity intentionally or otherwise. Furthermore, Brueckheimer et. al. discloses that this provides a means of authentication such that each trunking AVJ at the end of a communication path knows that it has connected the voice path through to the AGR network correctly by providing analogous integrity checks in existing narrowband exchanges which have an additional integrity pattern or other signaling scheme to ensure proper cross-connection of narrowband channels through the fabric. (Brueckheimer et al., col. 13, lines 20-30)

In contrast, claim 1 recites a continuity check operation that sends a pattern of bits through a first interface on a packet network to a second interface on the packet network wherein the pattern of bits is generated by a narrowband-to-packet network adapter having a bit pattern generator. The Brueckheimer et al. patent does not disclose or suggest the claim limitations missing from the I.610 reference. Therefore, even if there were some motivation to combine the disclosures of the I.610 reference and the Brueckheimer et. al. patent, such a combination would not have suggests the narrowband-to-packet network adapter having a bit pattern generator as recited in independent claims 1, 10, 16 and 20.

In view of the foregoing remarks, applicant respectfully requests reconsideration and withdrawal of the rejection of independent claims 1, 4, 10 and 20. Claims 2-3, 5-9 and 11-12 should be allowed at least for the same reasons.

Claims 13, 14 and 16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over the Brueckheimer et al. patent in view of U.S. Patent No. 5,555,261 (Nakayama et. al.). Applicant respectfully traverses this rejection.

The Nakayama et al. patent relates to an interface device for producing transmission clock timing information on user data, transmitting the same in the form of a cell, and conforming the timing of a reception clock with that of a transmission clock so as to output the user data in synchronism with the reception clock (Nakayama et al., col.1, lines 6-15). The Nakayama et al. patent, however, does not suggest or disclose a gateway to execute continuity check operations between a narrowband and packet network as recited in the pending claims. The Nakayama et al. patent does disclose a pattern generator 114 that produces predetermined test data that is converted into an ATM cell and a pattern checker 144 that compares the received test data in the ATM cell with known test data. (Nakayama et al., col. 35, lines 60 – col. 36, line 28); however, the disclosure is completely silent regarding use of the pattern generator 114 or pattern checker 144 to perform any type of continuity check for a narrowband call over a packet network connection as recited in claim 16; and provides no suggestion or teaching of a communications system comprising a first gateway to adapt a narrowband to the packet network as recited in claim 13.

In view of the foregoing remarks, applicant respectfully requests reconsideration and withdrawal of the rejection of independent claims 13 and 16. Claim 14 and 15 should be allowed for at least the same reasons.

Conclusion

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or

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concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the foregoing remarks, applicant respectfully requests allowance of the claims.

Please apply any charges or credits to deposit account 06-1050, referencing Attorney Docket No. 06269-027001.

Respectfully submitted,

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